

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	
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Stacy A. McCauley Cooney	:	Case No.: 18-13947-MDC
	:	
	:	
Debtor(s)	:	Chapter 13

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**MOTION TO MODIFY PLAN AFTER CONFIRMATION**

The Debtor, Stacy A. McCauley Cooney, by and through her undersigned counsel, hereby move to modify her Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about June 13, 2018.
2. The Chapter 13 filing was assigned case number 18-13947.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about June 13, 2019.
4. On or about July 29, 2020, the mortgagee, Nationstar Mortgage d/b/a Mr. Cooper (hereinafter referred to as Nationstar), filed a Notice of Debtor's Request for Covid Forbearance.
5. On or about November 6, 2020 the Debtor and Nationstar, entered into an agreement that the amount due and owing as a result of the forbearance will be cured by amending the Chapter 13 plan.
6. In accordance with the agreement, the Debtor will cure the subject \$15,931.20 by amending the Chapter 13 plan.
7. In furtherance thereof and the Debtor curing the forbearance payments, this Motion and Modified Chapter 13 Plan are being contemporaneously filed.

**WHEREFORE**, the Debtor requests that she be permitted to modify her Chapter 13 Plan for the above-stated reasons.

Dated: December 1, 2020

/s/Brad J. Sadek, Esq  
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